

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA**

**RED BARN MOTORS, INC,
DONALD B. RICHARDSON, AND
BARBARA A. RICHARDSON**

CIVIL ACTION NO. 13-00778

VERSUS

JUDGE BRIAN A. JACKSON

**NEXTGEAR CAPITAL, INC,
as successor-in-interest to DEALER
SERVICES CORPORATION, and
LOUISIANA'S FIRST CHOICE AUTO
AUCTION, L.L.C.**

MAG. RICHARD L. BOURGEOIS, JR.

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADING**

NOW INTO COURT, through undersigned counsel, comes Louisiana's First Choice Auto Auction, L.L.C., one of the Defendants in the above captioned matter, who respectfully represents:

1.

Red Barn Motors, Inc., Donald B. Richardson and Barbara A. Richardson (collectively "Plaintiffs") filed their Complaint on or about December 3, 2013.

2.

Plaintiffs served a copy of the Summons and Complaint on Louisiana's First Choice Auto Auction, L.L.C., via personal service on January 3, 2014.

3.

Plaintiffs filed the Acceptance of Service of Process with this Court on January 14, 2013.

4.

Louisiana's First Choice Auto Auction, L.L.C. has not requested any previous extension of time in this matter and there has been no objection stated by Plaintiffs or filed in the record by Plaintiffs, which extension has been requested by letter to plaintiffs' counsel.

5.

Therefore, pursuant to Local Rule 7.6, Louisiana's First Choice Auto Auction, L.L.C. requests an extension of time through February 10, 2014, to respond to the Complaint filed by Plaintiffs.

WHEREFORE, Louisiana's First Choice Auto Auction, L.L.C., prays:

1. That the Court issue an Order continuing the deadline for filing responsive pleadings to the Complaint by Red Barn Motors, Inc., Donald B. Richardson, and Barbara A. Richardson through and until the 10th day of February, 2013; and
2. For such other and further relief as may be just in the premises.

Respectfully submitted,

/s/ Lisa Brener
Lisa Brener, (#1809)
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*Attorneys for Defendant, Louisiana's First
Choice Auto Auction, L.L.C.*

CERTIFICATE OF SERVICE

I hereby certify that on January __, 2014, a copy of the foregoing Motion for Extension of Time to File Responsive Pleadings has been filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

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/s/ Lisa Brenner
Lisa Brenner